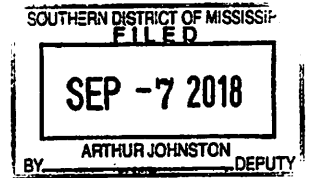


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. 1:18CR141LG-RHW

TARYN GOIN NAIDOO

18 U.S.C. § 2252(a)(4)(B) and (b)(2)

The Grand Jury charges:

COUNT 1

That from on or about November 17, 2016, continuing through on or about July 10, 2017, in Hancock County, in the Southern Division of the Southern District of Mississippi, and elsewhere, the defendant, **TARYN GOIN NAIDOO**, did knowingly possess one or more matters that contained any visual depiction, using any means or facility of interstate or foreign commerce, including by computer, or that had been mailed, shipped, or transported in interstate or foreign commerce, or which was produced using materials that had been so mailed, shipped, or transported, the production of which involved one or more minors, to include a prepubescent minor or a minor who had not attained 12 years of age, engaging in sexually explicit conduct and the depiction was of such conduct, specifically: the defendant possessed a Sandisk Micro SD card 16 GB, Serial Number 113408651D, containing one or more file images, in digital still or video format, that contained visual depictions, the production of which involved the use of a minor engaged in sexually explicit conduct, to include a prepubescent minor or a minor who had not attained 12 years of age, and was of such conduct, as defined in Title 18, United States Code, Section 2256, and that had traveled in interstate commerce.

All in violation of Title 18, United States Code, Sections 2252(a)(4)(B) and (b)(2).

COUNT 2

That on or about July 10, 2017, in Hancock County, in the Southern Division of the Southern District of Mississippi, and elsewhere, the defendant, **TARYN GOIN NAIDOO**, did knowingly possess one or more matters that contained any visual depiction, using any means or facility of interstate or foreign commerce, including by computer, or that had been mailed, shipped, or transported in interstate or foreign commerce, or which was produced using materials that had been so mailed, shipped, or transported, the production of which involved one or more minors, to include a prepubescent minor or a minor who had not attained 12 years of age, engaging in sexually explicit conduct and the depiction was of such conduct, specifically: the defendant possessed a Lexar Micro SD card 64 GB, Serial Number 7226181001G 31464-C10-64GBBMA 391413, containing one or more file images, in digital still or video format, that contained visual depictions, the production of which involved the use of a minor engaged in sexually explicit conduct, to include a prepubescent minor or a minor who had not attained 12 years of age, and was of such conduct, as defined in Title 18, United States Code, Section 2256, and that had traveled in interstate commerce.

All in violation of Title 18, United States Code, Sections 2252(a)(4)(B) and (b)(2).

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

As a result of committing the offense as alleged in this Indictment, the defendant shall forfeit to the United States all property involved in or traceable to property involved in the offense, including but not limited to all proceeds obtained directly or indirectly from the offense, and all property used to facilitate the offense.

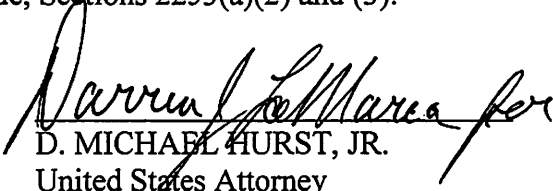
The grand jury has determined the probable cause exists to believe that the following property is subject to forfeiture as a result of the offense of the offense alleged in this indictment:

1. Sandisk Micro SD card 16 GB, Serial Number 113408651D, and
2. Lexar Micro SD card 64 GB, Serial Number 7226181001G 31464-C10-64GBBMA 391413, and
3. ASUS Laptop Computer, Model G751J, serial number F4N0WU16140418D, containing two (2) hard drive devices: a 256 GB SanDisk Solid State Drive (SSD) HDD, serial number 150603402026, and a 1 TB (Terabyte) HGST Storage hard drive, serial number 6P2439PN, and
4. HP Laptop computer, serial number 5CG421G2YH.

Further, if any property described above, as a result of any act or omission of the defendant:

(a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been commingled with other property, which cannot be divided without difficulty, then it is the intent of the United States to seek a judgment of forfeiture of any other property of the defendant, up to the value of the property described in this notice or any bill of particulars supporting it.

All pursuant to Title 18, United States Code, Sections 2253(a)(2) and (3).


D. MICHAEL HURST, JR.
United States Attorney

A TRUE BILL:

s/signature redacted

Foreperson of the Grand Jury

This indictment was returned in open court by the foreperson or deputy foreperson of the Grand Jury on this the 7th day of September, 2018.


UNITED STATES MAGISTRATE JUDGE